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6 *Attorney for Defendant*
7 *Wynn Las Vegas, LLC*

8 **UNITED STATES DISTRICT COURT**
9
10 **DISTRICT OF NEVADA**

11 VERONICA MORA, an individual,
12 Plaintiff,

13 vs.

14 ELION PRODANI, an individual; WYNN
RESORTS, LTD. dba WYNN RESORTS, a
15 Nevada corporation,
16 Defendant.

Case No. 2:19-cv-01225-JAD-NJK

**ORDER GRANTING STIPULATION TO
(1) DISMISS WYNN RESORTS, LTD. dba
WYNN RESORTS WITH PREJUDICE, (2)
ADD DEFENDANT WYNN LAS VEGAS,
LLC AS THE PROPER DEFENDANT,
and (3) AMEND THE CASE CAPTION**

[ECF Nos. 18, 19]

17 Defendant Wynn Las Vegas, LLC (misnamed and erroneously sued as Wynn Resorts, Ltd.
18 dba Wynn Resorts), Defendant Elion Prodani, and Plaintiff Veronica Mora, by and through their
19 respective counsel of record, hereby stipulate as follows:

20 Plaintiff was employed by Defendant Wynn Las Vegas, LLC, but erroneously named her
21 former employer as “Wynn Resorts, Ltd. dba Wynn Resorts.” Plaintiff was never employed by
22 Wynn Resorts, Ltd. dba Wynn Resorts, which is the incorrect corporate entity. In the interest of
23 judicial economy, and to avoid the unnecessary time and cost of motion practice, the parties have
24 agreed to correct this mistake by dismissing the mistakenly named incorrect entity, “Wynn
25 Resorts, Ltd. dba Wynn Resorts,” and adding in as the proper party Defendant Wynn Las Vegas,
26 LLC, Plaintiff’s prior employer.

27 Defendant Wynn Las Vegas, LLC waived the service requirement and filed its Answer as
28 the correct party in this matter on September 25, 2019. Thus, the Parties have stipulated to the

1 following:

2 1. That Defendant Wynn Resorts, Ltd. dba Wynn Resorts be dismissed from this
3 action with prejudice;

4 2. That Defendant Wynn Las Vegas, LLC be named as the proper Defendant,
5 undersigned counsel having been authorized to accept service of Plaintiff's Complaint against
6 Wynn Las Vegas, LLC and file an answer on its behalf on September 25, 2019;

7 3. That the caption be revised to reflect that the entity identified as "Wynn Resorts,
8 Ltd. dba Wynn Resorts" shall be stricken from the caption; and

9 4. That the caption be revised to reflect the addition of "Wynn Las Vegas, LLC" as
10 the properly named Defendant.

11 This stipulation is submitted and based upon the following:

12 1. Defendant Wynn Las Vegas, LLC was Plaintiff's employer and is the proper
13 Defendant in this action. As such, there is good cause for dismissing Wynn Resorts, Ltd. dba
14 Wynn Resorts, adding Wynn Las Vegas, LLC as the proper Defendant, and for correcting the
15 caption;

16 2. Defendant Wynn Las Vegas, LLC has authorized its undersigned counsel to accept
17 service of the Complaint on its behalf (to avoid any additional cost to Plaintiff or delay), and
18 previously filed its Answer;

1 3. This request is made in good faith, in the interest of judicial economy and to save
2 the Parties the time and expense of motion practice to name the proper Defendant and correct the
3 caption, and is not for the purpose of delay.

4 Respectfully submitted this 5th day of November 2019.

5
6 GARG GOLDEN LAW FIRM

7 /s/ Melody R. Rissell

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17 *Attorneys for Plaintiff Veronica Mora*

Attorney for Defendant Elion Prodani

18
19
20 **ORDER**

21 IT IS SO ORDERED this 12th day of November 2019.

22
23 
24 U.S. District Judge Jennifer A. Dorsey